

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                          |   |                           |
|--------------------------|---|---------------------------|
| _____                    | ) |                           |
| UNITED STATES OF AMERICA | ) |                           |
|                          | ) |                           |
| v.                       | ) | Criminal No. 16-10094-LTS |
|                          | ) |                           |
| ROSS MCLELLAN,           | ) |                           |
|                          | ) |                           |
| Defendant.               | ) |                           |
| _____                    | ) |                           |

**GOVERNMENT’S MOTION FOR LEAVE TO FILE RESPONSE TO DEFENDANT’S  
MOTION FOR A REDUCTION OF SENTENCE PARTIALLY UNDER SEAL**

The government respectfully moves, with the assent of the defendant, for leave to file its response to the defendant’s motion for a reduction of his sentence pursuant to 18 U.S.C. § 3582(c)(1) partially under seal.

As grounds therefore, the government notes that portions of the defendant’s motion, and the exhibits thereto, discuss medical information and information relating to the defendant’s children, and the Court therefore granted the defendant leave to file his motion partially under seal. The government’s response will address some of those same issues. Accordingly, the government respectfully requests the Court’s permission to file its responsive brief partially under seal. A redacted copy will be filed on the public docket and an unredacted copy will be submitted to the Court and the defendant.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ Stephen E. Frank  
STEPHEN E. FRANK  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I certify that on December 6, 2020, this document was filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Stephen E. Frank  
STEPHEN E. FRANK